

IN THE CIRCUIT COURT OF JACKSON COUNTY, MO  
STATE OF MISSOURI

STATE OF MISSOURI ex rel.	)	
Attorney General Eric Schmitt,	)	
	)	
Plaintiff,	)	
	)	Cause No.
v.	)	
	)	Div.
Shangri-La Massage	)	
SERVE AT:	)	
7424 Wornall Rd,	)	
Kansas City, Missouri, 64114;	)	
	)	
XingMei Fang	)	
SERVE AT:	)	
228 NE Barry Rd	)	
Kansas City, MO 64155;	)	
	)	
M&G McClain LLC	)	
SERVE AT:	)	
Michael A. Nigro	)	
221 East Gregory Blvd,	)	
Suite D	)	
Kansas City, MO 64114	)	
	)	
Defendants.	)	

**PETITION FOR INJUNCTION**  
**OF A PUBLIC NUISANCE**

Plaintiff State of Missouri, at the relation of Attorney General Eric S. Schmitt, brings this Petition for Preliminary Injunctions of a Public Nuisance, and upon information and belief, states as follows:

1. Illicit Massage Businesses (IMB) provide illegal sexual services to customers under the guise that they are a legitimate massage therapy business providing only legal and licensed massage therapy.

2. IMBs often serve as a front for human trafficking, illegal sex work, and forced labor.<sup>1</sup>

3. The Polaris Project estimates that there are approximately 9,000 IMBs operating in the United States. Missouri is no exception. *See Exhibit 1.*

4. There are several indicators that a massage parlor is engaging in commercial sex and potential human trafficking. These include: prices significantly below market; customer reports of female masseuses who request large tips and who express disappointment if they do not receive a tip;; windows covered in a way that prevents passerbys from seeing inside the business; open late hours (i.e., until 9 p.m. or later); and advertising or customer reviews on commercial sex websites like RubMaps.ch, BackPage.com, and other illicit websites. *Id.* at 9.

5. Advertisements for IMBs may include a description of the masseuses' appearance or age, emphasizing their physical characteristics and young age. The advertisements typically include sexually-suggestive photos of

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<sup>1</sup> See Nicholas Kulish, et al., "Behind Illicit Massage Parlors Lie Vast Crime Network and Modern Indentured Servitude," NEW YORK TIMES, March 3, 2019, available at: <https://www.nytimes.com/2019/03/02/us/massage-parlors-human-trafficking.html>.

Asian women that emphasize the women's appearance, not their massage therapy skills. *See id.*

6. In order to facilitate these illicit services, IMBs utilize websites that are solely used for the purposes of soliciting illicit behavior to advertise. *See Order, State of Missouri v. Golden Massage, et al.*, Case No. 1731-CC00950 (Greene County, Missouri, Aug. 20, 2020) ("The only purpose for which a massage business would advertise on BackPage.com CitXGuide.com, or Rubmaps.com [RubMaps.ch] is to attempt to promote prostitution service[s.]").

7. Indeed, BackPage.com was seized by federal law enforcement in 2018 because it was the largest online marketplace for illegal sex trafficking.

### **Exhibits 2 and 3.<sup>2</sup>**

8. CityXGuide.com was created one day after the FBI's seizure of BackPage.com in order to fill the space created by the shutdown.<sup>3</sup>

9. In 2020, CityXGuide.com was also seized by federal law enforcement because it was "a leading source of online advertisements for

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<sup>2</sup>*See also* Sarah N. Lynch, Lisa Lambert, *Sex ads website Backpage shut down by U.S. authorities*, REUTERS, April 6, 2018, available at: <https://www.reuters.com/article/us-usa-backpage-justice/sex-ads-website-backpage-shut-down-by-u-s-authorities-idUSKCN1HD2QP>.

<sup>3</sup> See "U.S. Attorney's Office Shuts Down Website [CityXGuide.com] Promoting Prostitution and Sex Trafficking, Indicts Owner," U.S. Department of Justice, June 19, 2020, available at: <https://www.justice.gov/usao-ndtx/pr/us-attorney-s-office-shuts-down-website-promoting-prostitution-and-sex-trafficking#:~:text=June%2019%2C%202020-,U.S.%20Attorney's%20Office%20Shuts%20Down%20Website,and%20Sex%20Trafficking%2C%20Indicts%20Owner&text=Shortly%20after%20the%20defendant's%20arrest,Security%20pursuant%20to%20a%20warrant.>

prostitution and sex trafficking that users described as ‘taking over from where Backpage left off.’”<sup>4</sup>

10. After the shutdown of BackPage.com and CityXGuide.com, similar websites were created and proliferated, such as RubMaps.ch, AdultSearch.com, Eccie.net, and HarlotHub.com. These websites serve as platforms for IMBs to advertise their illicit services.<sup>5</sup>

11. SkipTheGames.com is frequently used to advertise prostitution services under the category of massage services.<sup>6</sup> In fact, SkipTheGames.com has been called “a more graphic and ‘in-your-face’ version of BackPage.”<sup>7</sup>

12. Rubmaps.ch allows users to post reviews of massage parlors, including the type of sexual contact that has been allowed at the massage parlor.

13. The Attorney General is seeking injunctive relief preventing Shangri-La Massage, XingMei Fang, and M&G McClain LLC from engaging in conduct prohibited by § 567.080.

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<sup>4</sup> *Id.*

<sup>5</sup> See Dan Whitcomb “Exclusive: Report gives glimpse into murky world of U.S. prostitution in post-Backpage era,” REUTERS, available at: <https://www.reuters.com/article/us-usa-prostitution-internet-exclusive-idUSKCN1RN13E>.

<sup>6</sup>See Manuel Gamiz Jr., “Backpage is gone, but a more graphic version is again fueling prostitution busts in the Lehigh Valley,” THE MORNING CALL, Apr 05, 2019, available at: <https://www.reuters.com/article/us-usa-prostitution-internet-exclusive-idUSKCN1RN13E>.

<sup>7</sup> *Id.*

### **Parties**

14. Eric S. Schmitt is the duly elected Attorney General of the State of Missouri and brings this action in his official capacity pursuant to Mo. Rev. Stat. Chapter 567.

15. Defendant Shangri-La Massage is registered to do business in the State of Missouri, and holds itself out as a massage therapist with its principal place of business located at 7424 Wornall Road, Kansas City, Missouri 64114 .

16. Defendant XingMei Fang is the owner of Shangri-La Massage and resides at 8718 Wornall Road, Apartment 37, Kansas City, Missouri 64114 in Jackson County, Missouri.

17. Defendant M&G McClain LLC (“Landlord”) is the owner of the real property where Shangri-La Massage is located (the “Premises”).

18. Landlord is registered to do business within the State of Missouri, with a its principle place of business at 221 East Gregory Boulevard, Suite D, Kansas City, MIssouti 64114, in Jackson County, Missouri.

### **Jurisdiction and Venue**

19. This Court has subject matter and personal jurisdiction over this action under Art. V, § 14 Mo. Const. and Mo. Rev. Stat. § 506.500.

20. Venue is proper in this Court pursuant to Mo. Rev. Stat. § 508.010.2, in that venue lies in any county in which a Defendant resides or can be found.

21. Venue is proper because the Premises, which is the subject matter of this lawsuit, is located within Jackson County.

### **Statutory Authority**

22. Mo. Rev. Stat. §567.080 declares the regular use of a room, building, or structure for prostitution activity to be a public nuisance, and allows the Attorney General to prosecute a suit to enjoin the nuisance. The Attorney General may include owners, lessees, officers, agents, or employees in the action.

### **Allegations of Fact**

23. For years, massage parlors located throughout the State of Missouri have been conducting public nuisances by “providing sexual contact for pay and/or unlawful prostitution activity” on business premises. Shangri-La Massage is one such illicit massage parlor.

24. Shangri-La Massage advertises its services on RubMaps.ch, BodyRubsMap, Eccie.net, HarlotHub.com, KC.iBackpage, RubRatings, and SkipTheGames.com.

25. The advertisements posted by Shangri-La Massage on these sites contained the following graphic and/or suggestive content:

- a. Defendant Shangri-La Massage posted an advertisement on RubMaps.ch under the category “erotic massage.” **Exhibit**

4. The advertisement states it is open until 10:00 p.m. *Id.*

The advertisement includes Shangri-La Massage's phone number and address, as well as a photo of the outside of the massage parlor. *Id.* The RubMaps advertisements includes nine reviews of services provided by "Tina," "Mia," "May," and "Katie." *Id.* RubMaps is a website that advertises itself as a place "Where fantasy meets reality." *Id.* On the RubMaps.com website, there is a banner ad which includes a photo of a woman in lingerie and forum posts for "Escort Reviews." *Id.* Across the top, RubMaps suggests searches such as "Erotic massage Des Moines, Asian massage Des Moines." *Id.*

- b. An advertisement for Shangri-La Massage was posted on BodyRubsMap.com, an escort website, on February 22, 2021 at 12:10 p.m. **Exhibit 5.** This advertisement includes Shangri-La Massage's phone number and address. *Id.* This advertisement states it is open until 10:00 p.m. and includes sexually-suggestive photos of women with very little reference to massage therapy. *Id.*
- c. An advertisement for Shangri-La Massage was posted on HarlotHub.com, an escort website. **Exhibit 6.** This advertisement includes the name of the business, the

address, and phone number of the business. *Id.* The HarlotHub.com advertisement describes Shangri-La Massage as an “Escort near Kansas City, Missouri.” *Id.* This advertisement includes the statement, “NEW FACE & NEW FEELING” and that it is open until 10:00 p.m. *Id.* The HarlotHub.com advertisement includes a description of the age of the masseuse as 24 years old. *Id.* The website for HarlotHub.com has a linked button to view “Live Sex.” *Id.*

- d. An advertisement for Shangri-La Massage was posted on iBackPage.com, an iteration of BackPage.com that was created after BackPage.com was seized by the Federal Government. **Exhibit 7.** The iBackPage.com advertisement claims it offers “100% Beauty” and “100% SWEET GIRLS” as well as “Young and beautiful girls [who] provide you with the best massage service.” *Id.* Indeed, the advertisement explicitly states that “Erotic Massage Parlors is [sic] available at 7424 Wornall Rd. Kansas City” and that “Our girls love to provide you the best *body to body* massage at 7424 Wornall Rd.Kansas City.” *Id.* (emphasis added). The advertisement continues, stating that “Hot masseuse are [sic] providing Nuru Massage at 7424 Wornall Rd.Kansas



City” and that Shangri-La Massage provides the “Best happy ending experience . . . .” *Id.*

- e. An advertisement for Shangri-La Massage was posted on RubRatings.com, an escort website. **Exhibit 8.** Shangri-La Massage last posted an advertisement on RubRatings.com on February 22, 2021. *Id.* This advertisement includes Shangri-La Massage’s phone number and address. *Id.* This advertisement states it is open until 10:00 p.m. and includes sexually-suggestive photos of women with no reference to massage therapy. *Id.*
- f. At least 4 advertisements for Shangri-La Massage were posted February of 2021 on SkipTheGames.com. **Exhibit 9.** SkipTheGames.com’s slogan is “Skip the games. Get Satisfaction.” *Id.* All of the advertisements posted on SkipTheGames.com include Shangri-La Massage’s phone number and address. *Id.* The advertisements state it is open until 10:00 p.m. and includes sexually-suggestive photos of women with no reference to massage therapy. *Id.* The advertisements include a “Legal disclaimer” stating, “Any actions that take place within our contracted timeframe are a matter of mutual choice between consenting adults.” *Id.*

g. Shangri-La Massage's advertisements on SkipTheGames.com can also be accessed through SumoSearch.com. **Exhibit 10.** SumoSearch.com shows 221 results found for Shangri-La Massage's phone number. *Id.*

26. Since at least 2018, Shangri-La Massage has been conducting business from the Premises located at 7424 Wornall Road, Kansas City, Missouri, 64114, pursuant to a lease agreement between Landlord and Shangri-La Massage.

27. On November 10, 2020, Petitioner notified Landlord via certified mail regarding the highly suspicious nature of Shangri-La Massage's advertising for services offered at the Premises. Petitioners informed Landlord that the Premises was being advertised as available for prostitution activity. Petitioner's letter requested Landlord to take action to abate the public nuisance created by such prostitution activity.

28. Landlord received the letter.

29. Landlord failed to take action to abate the public nuisance occurring at the Premises.

30. Shangri-La Massage is registered as a fictitious name with the State of Missouri, with its owner listed as XingMei Fang. Fang is aware of the prostitution activities taking place at Shangri-La Massage. On information and belief, Fang knowingly profits from the prostitution activities.

**Count I – Operating a Public Nuisance**  
**(Against All Defendants)**

31. Petitioner incorporates all of the allegations contained in Paragraphs 1 through 30 above.

32. Shangri-La Massage, utilizes the Premises located at 7424 Wornall Road, Kansas City, Missouri 64114, in Jackson County Missouri, as a massage parlor in which employees of Shangri-La Massage carry out sexual conduct on customers of Shangri-La Massage in exchange for money or other items of value.

33. As such, the Premises, which are occupied by Shangri-La Massage, is regularly used for prostitution activity prohibited under chapter 567.080, RSMo.

34. As such, the Premises occupied by Shangri-La Massage constitutes a public nuisance under § 567.080.

35. Defendants XingMei Fang and Landlord aided and/or facilitated the public nuisance.

WHEREFORE, Petitioner State of Missouri ex rel. Attorney General Eric S. Schmitt respectfully requests that the Court enter judgment in favor of Petition enjoining the nuisance, and such further relief as this Court deems just and proper.

**Count II – Operating a Public Nuisance under §567.080.3**  
**(Against XingMei Fang)**

36. Petitioner incorporates all of the allegations contained in Paragraphs 1 through 35 above.

37. The Premises, which are occupied by Shangri-La Massage, is a public nuisance because it is regularly used for prostitution activity prohibited by § 567.080, RSMo.

38. Fang is the owner, officer, agent, or employee of Shangri-La Massage.

39. Fang aided and/or facilitated the public nuisance occurring on the Premises by advertising on the following illicit websites: RubMaps.ch, BodyRubsMap, Eccie.net, HarlotHub.com, KC.iBackpage, RubRatings, and SkipTheGames.com.

WHEREFORE, Petitioner State of Missouri ex rel. Attorney General Eric S. Schmitt respectfully requests that the Court enter judgment enjoining [IMB owner] from engaging in, aiding in, or promoting any prostitution activity anywhere within this Court's jurisdiction, and such further relief as this Court deems just and proper.

**COUNT III – Operating A Public Nuisance under §567.080.2 and §**  
**567.080.3**  
**(Against Landlord)**

40. Petitioner incorporates all of the allegations contained in Paragraphs 1 through 39 above.

41. The Premises, which are occupied by Shangri-La Massage, are regularly used for prostitution activity.

42. Landlord owns the Premises, upon which Shangri-La Massage is operating a public nuisance.

43. As of November 10, 2020, Landlord knew or had reason to believe that the Premises was being being used regularly for prostitution activity.

44. As such, the Premises is a public nuisance.

45. Landlord, as an owner, officer, agent, or employee of Shangri-La Massage, aided and facilitated the public nuisance on the Premises in violation of chapter 567.080, RSMo.

46. WHEREFORE, Petitioner State of Missouri ex rel. Attorney General Eric S. Schmitt respectfully requests that the Court enter judgment enjoining Landlord from allowing the Premises to be use for prostitution activities, order that the Premises shall not be occupied for one year, and such other relief as this court deems just and proper.

Respectfully submitted,  
**ERIC S. SCHMITT**  
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